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Attorneys for INTERVENORS  
HOSPITALITY HOUSE, COALITION ON  
HOMELESSNESS, and FAITHFUL FOOLS

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

COLLEGE OF THE LAW, SAN FRANCISCO, a  
public trust and institution of higher education duly  
organized under the laws and the Constitution of the  
State of California; FALLON VICTORIA, an  
individual; RENE DENIS, an individual;  
TENDERLOIN MERCHANTS AND PROPERTY  
ASSOCIATION, a business association; RANDY  
HUGHES, an individual; and KRISTEN  
VILLALOBOS, an individual,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO, a  
municipal entity,

Defendant.

**Case No. 4:20-cv-3033-JST**

**DECLARATION OF LAUREN  
HANSEN IN SUPPORT OF  
INTERVENORS' RESPONSE  
TO DEFENDANT'S  
ADMINISTRATIVE MOTION  
TO CONSIDER WHETHER  
CASES ARE RELATED**

Action Filed: May 4, 2020

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6 **(Counsel for Intervenors continued from previous page)**  
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1 I, Lauren Hansen, declare:

2 1. I am an attorney with the Public Interest Law Project, admitted to practice law in  
3 California and before this court. I represent Intervenor Hospitality House, Coalition on  
4 Homelessness, and Faithful Fools in Intervenor's Opposition to the City and County of San  
5 Francisco's Motion to Relate *Coalition on Homelessness et al. v. City and County of San*  
6 *Francisco*: Case No.: 4:22-cv-05502-DMR to this case.

7 2. The facts set forth below are known to me personally, and I have first-hand  
8 knowledge of these facts. If called as a witness, I could and would testify competently, under  
9 oath, to such facts.

10 3. After Plaintiffs College of Law, et al. filed their case against the City and County  
11 of San Francisco ("City") complaining about homelessness in the Tenderloin Neighborhood, I  
12 became aware that the parties had immediately entered into settlement negotiations.

13 4. On June 2, 2020, I sent a letter to Plaintiffs and the City asking them to stipulate  
14 to Hospitality House's, Coalition on Homelessness's, and Faithful Fools' intervention in the case  
15 to make sure that unhoused people had a say in the negotiations. Plaintiffs and the City declined  
16 this request.

17 5. Even though Plaintiffs and the City shut our clients out of the settlement  
18 discussions, we endeavored at every opportunity to provide input into the negotiated agreement  
19 and its implementation.

20 6. We communicated with Judge Corley about our clients' concerns with the  
21 Stipulated Injunction and we proposed changes, but those communications did not result in any  
22 amendments to the Stipulated Injunction.

23 7. On August 14, 2020, I sent a detailed letter to Jeremy Goldman of the San  
24 Francisco City Attorney's office that described Intervenor's concerns with the Stipulated  
25 Injunction and proposed potential modifications and/or agreements to address those concerns.  
26 After that I exchanged emails with Mr. Goldman, and we spoke multiple times. However, the  
27 City was not willing to agree to any modifications to the Stipulated Injunction.

28 8. Throughout the remainder of 2020 and much of 2021, my colleagues and I

1 continued to communicate with Mr. Goldman about potential improvements to the City's  
2 Coordinated Entry System to address some of the issues that Intervenor had raised in this  
3 lawsuit, and the City committed to several requested changes.

4 9. During the summer and fall of 2020, I also supported Hospitality House's,  
5 Coalition on Homelessness's, and Faithful Fools' on-the-ground efforts to make sure the City  
6 implemented the agreement in a fair and equitable way, especially for unhoused people who  
7 have physical and mental health impairments. I spoke with Kelley Cutler and Brian Edwards,  
8 staff for the Coalition on Homelessness, as well as Joe Wilson, Executive Director of Hospitality  
9 House, and Sam Dennison at Faithful Fools regularly while the City implemented the Stipulated  
10 Injunction. They were conducting outreach and speaking with City staff as they helped unhoused  
11 people secure Shelter-in-Place hotels and other shelter placements. I reviewed videos of their  
12 attempts to get City officials to offer available and appropriate shelter to unhoused people in the  
13 Tenderloin, including people with disabilities.

14 10. Three years have passed since the case was administratively closed, and I was not  
15 aware of any alleged dispute between Plaintiffs and the City regarding the Stipulated Injunction.

16 11. On September 8, 2023, I received a notification from the Court, referring the  
17 parties to a pre-settlement conference. I called Tara Steeley, Deputy City Attorney on September  
18 11, 2023, and left her a voicemail message inquiring about why the case was being referred to  
19 settlement. She did not return my phone call. I also emailed Ms. Steeley and her colleague  
20 Wayne Snodgrass, and received no reply.

21 12. I was not aware of the discussions about the Stipulated Injunction that Plaintiffs  
22 and the City claim, in their moving papers, to have been for months. I did not know that the  
23 Plaintiffs had initiated the ADR procedure described in Section VI of the Stipulated Injunction in  
24 contemplation of a motion filed with the Court.

25 13. I also did not know that the Plaintiffs and the City had a settlement conference  
26 with Judge Corley on September 8, 2023, and I would have tried to attend that settlement  
27 conference on behalf of my clients if I had known about it. I am not aware of any notification  
28 from the Court that this conference was set, or any minute entry showing that it was held.

1           14. I participated in a call with Judge Cisneros to discuss Intervenor's participation in  
2 the new round of discussions of the Stipulated Injunction on September 15, 2023. I also  
3 participated in a pre-settlement conference with all of the parties on October 2, 2023.

4           15. Later that afternoon on October 2, 2023, I received an email from Zuzana Ikels,  
5 Deputy City Attorney, asking if Intervenor's would join the City in a motion to relate the  
6 Coalition on Homelessness case to this one. She stated that the City was planning to file the  
7 motion the next day. After reviewing a draft stipulation, Intervenor's declined to stipulate to the  
8 Motion and indicated that we would oppose the Motion.

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10           I declare under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct to the best of my knowledge. Executed on October 10, 2023  
12 Oakland, California.

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17 Lauren Hansen  
18 *Attorney for Intervenor*  
19 *Hospitality House; Coalition on Homelessness; and*  
20 *Faithful Fools*  
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